No. 25-6536

IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

TODD R.G. HILL,

Plaintiff–Appellant,

v.

THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND INDIVIDUALS OF THE PEOPLES COLLEGE OF LAW, et al.,

Defendants–Appellees.

Appeal from the United States District Court
for the Central District of California
No. 2:23-cv-01298-JLS-BFM
Hon. Josephine L. Staton

APPELLANT'S NOTICE OF ERRATA

TO OPENING BRIEF

Filed By:

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November 30, 2025

APPELLANT'S NOTICE OF ERRATA
TO OPENING BRIEF

Appellant Todd R. G. Hill respectfully submits the following errata to his Opening Brief of Appellant, filed November 26, 2025. These corrections are limited to typographical and/or scriveners record-citation errors and do not alter the substance of the arguments presented.

I. *Village of Arlington Heights* Citation.

Wherever the Opening Brief refers to "*Village of Arlington Heights*" or "*Arlington Heights*," the intended authority is *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252 (1977) ("Arlington Heights"). In particular, on the page *vi* listing of cases under the Table of Authorities, and on page 4 of the Opening Brief, in Issue 3, the reference to "Village of Arlington Heights" should be understood to read "*Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252 (1977) ('*Arlington Heights*').

A. Addendum – pages where *Arlington Heights* appears

For the Court's convenience, the references to *Arlington Heights* in the Opening Brief appear at the following pages:

- p. *iii* – Table of Contents (heading: "A. The TAC order treated the allegations as 'impact only,' but the record presented (and proffered) *Arlington Heights* indicators of purpose.").

- p. *vi* – Table of Authorities (entry for "Village of Arlington Heights").
- p. 4 – Issues Presented, Issue 3 ("under *Village of Arlington Heights* and *Students for Fair Admissions*").
- p. 35 – Argument § III.A heading and text ("the record presented (and proffered) *Arlington Heights* indicators of purpose"; "the general *Arlington Heights* route to intent").
- p. 37 – Argument § III.A discussion footnote ("*Arlington Heights* framework guiding intent at Rule 12 …").
- pp. 52–53 – Argument (§ IV) conclusion ("*SFFA*, *Arlington Heights*, and *Foman* require …"; "…a proper *Arlington Heights* and *Ex parte Young* analysis …").

II. Page 37 – *Arlington Heights* framework record citations

In the footnote paragraph continuing from the previous page beginning, "*Arlington Heights* framework guiding intent at Rule 12," the record citations presently contain record excerpts volumes placeholder references.

Current text (excerpt):

"*Arlington Heights* framework guiding intent at Rule 12. The district court's refusal to consider Plaintiff's *Arlington Heights* showing combined with its denial of leave to amend foreclosed that analysis. See 1-ER-[pages reflecting L92–L120]; Preserved at 3-ER-[Rule 59(e) pages reflecting L87–L95]."

Corrected text (citations):

"*Arlington Heights* framework guiding intent at Rule 12. The district court's refusal to consider Plaintiff's *Arlington Heights* showing combined with its denial of leave to amend foreclosed that analysis. See 1-ER-48 ,49, 52, 54, 57-58, 60 (ECF 213); preserved at 3-ER-263 (Plaintiff's Objections and Request for De Novo Review, pg. 23)."

III. Page 7, Section III ("Procedural History") – duplicate word

In the first paragraph of Section III, the sentence beginning "This This appeal arises from …" contains a duplicated word.

Corrected text:

"This appeal arises from a civil-rights and RICO action …"

IV. Page 7, Section III ("Procedural History") – incorrect ER volume reference

In the paragraph beginning "After Defendants answered the First Amended Complaint ('FAC')," the bracketed record citation at the end of the sentence is to the wrong ER volume.

Current text (excerpt):

"After Defendants answered the First Amended Complaint ('FAC'), the court sua sponte dismissed the FAC and directed Hill to file an amended complaint within a specified period, which he did. [2-ER-__]."

Corrected text (citation only):

"After Defendants answered the First Amended Complaint ('FAC'), the court sua sponte dismissed the FAC and directed Hill to file an amended complaint within a specified period, which he did. [1-ER-45 (ECF 213)]."

V. Page 2 – Extra period in RICO summary sentence.

In the paragraph beginning "Hill appears pro se," an extra period appears at the end of that sentence.

Current text (excerpt):

"…*Eclectic Properties*, and *Kayport* constituting legal error warranting remand for proper application of those standards.."

Corrected body text (sentence only):

"…*Eclectic Properties*, and *Kayport*, constituting legal error warranting remand for proper application of those standards."

VI. Page 9 – leading period and formatting of Rosenwald citation

The citation for *Rosenwald* immediately following the sentence "Denial of leave after new jurisdictional evidence and curative allegations…", contains placeholder citation context for the published reporter in the case citation.

Current text:

"Denial of leave after new jurisdictional evidence and curative allegations is an abuse of discretion. (*Rosenwald v. KimberlyClark Corp.*, ___ F.4th ___ (9th Cir. 2025).)"

Corrected text:

"Denial of leave after new jurisdictional evidence and curative allegations is an abuse of discretion. (*Rosenwald v. Kimberly-Clark Corp.*, 152 F.4th 1167 (9th Cir. 2025).)"

VII. Page 31 – Second Amended Complaint typographical correction.

On the same page, the reference to the Second Amended Complaint is incomplete and contains a typographical error.

Current text (excerpt):

"Second Amended Complain"

Corrected text:

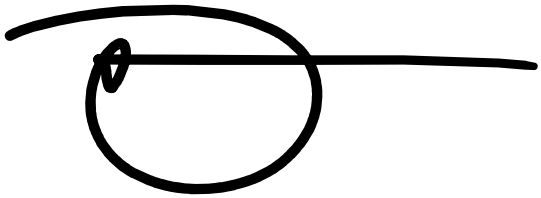
"Second Amended Complaint"

Conclusion

Appellant respectfully requests that the Court deem the Opening Brief corrected in the limited respects set out above. These revisions are confined to typographical and record-citation matters and are submitted to aid the Court's review by ensuring accurate references to the authorities and portions of the Excerpts of Record cited in the brief.

Dated: November 30, 2025

Respectfully submitted,



Todd R. G. Hill
Appellant, in propria persona

CERTIFICATE OF SERVICE

I certify that on November 30, 2025, I electronically filed the foregoing

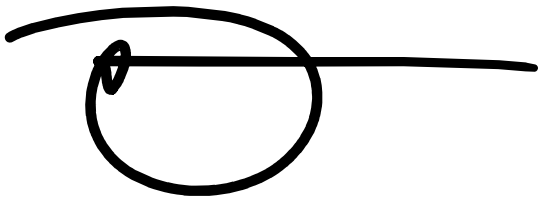
APPELLANT'S NOTICE OF ERRATA TO OPENING BRIEF

with the Clerk of the Court for the United States Court of Appeals for the Ninth Circuit by using the Court's Appellate Case Management/Electronic Case Filing system (ACMS/CM/ECF).

Participants in the case who are registered ACMS/CM/ECF users will be served by the appellate electronic filing system. Any participants who are not registered CM/ECF users and have provided express permission will be served by email at their addresses of record.

Dated: November 30, 2025

Respectfully submitted,



Todd R. G. Hill
Appellant, in propria persona